

STATE OF SOUTH CAROLINA

(Caption of Case)

IN RE: PETITION OF THE SOUTH CAROLINA
DEPARTMENT OF TRANSPORTATION FOR
IMPLEMENTATION OF 511 SERVICE FOR
TRAVEL INFORMATION

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 328 - C

(Please type or print)

Submitted by: Steven W. Hamm, Esq.

SC Bar Number: 2634

Telephone: 803-771-4400

Fax: 803-779-0016

Address: Richardson, Plowden & Robinson, P.A.

P.O. Drawer 7788

Columbia, South Carolina 29202

Other:

Email: shamm@richardsonplowden.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Petition to Intervene

INDUSTRY (Check one)

- ☐ Electric
☐ Electric/Gas
☐ Electric/Telecommunications
☐ Electric/Water
☐ Electric/Water/Telecom.
☐ Electric/Water/Sewer
☐ Gas
☐ Railroad
☐ Sewer
☒ Telecommunications
☐ Transportation
☐ Water
☐ Water/Sewer
☐ Administrative Matter
☐ Other: _____

NATURE OF ACTION (Check all that apply)

- | | | |
|--|--|--|
| <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Complaint | <input checked="" type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Oder | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

Print Form

Reset Form

October 16, 2007

INTERVIEW

1 O. Duke

Via Hand Delivery

The Honorable Charles L. A. Terreni
Chief Clerk and Administrator
The Public Service Commission of S.C.
P. O. Drawer 11649
Columbia, S.C. 29211

RECEIVED
2007 OCT 16 PM 2:59
SC PUBLIC SERVICE
COMMISSION

RE: Docket No. 2007-328-C – Petition of the South Carolina Department of Transportation
for Implementation of 511 Service for Travel Information
Verizon South Inc.'s Petition to Intervene

Dear Mr. Terreni:

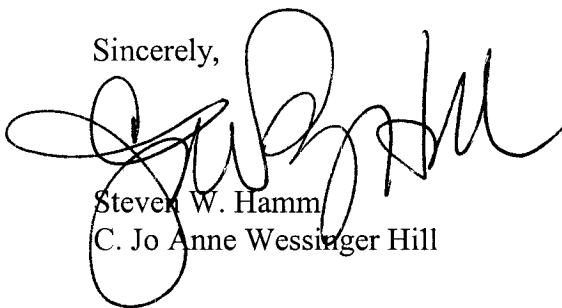
Enclosed for filing are an original and one copy of Verizon South Inc.'s ("Verizon")
Petition to Intervene in the above referenced matter.

By copy of this letter, I am serving all parties of record with a copy of the Petition as
indicated on the attached Certificate of Service.

If you should have any questions concerning this matter please contact my office.

With kind personal regards, I am

Sincerely,



Steven W. Hamm
C. Jo Anne Wessinger Hill

Enclosures

cc: Parties of Record

INTERVIEW
OK O. Duke

DOCKET 2007-328-C

2007 OCT 16 PM 2:59
SC PUBLIC SERVICE
COMMISSION

RECEIVED

PETITION OF THE SOUTH
CAROLINA DEPARTMENT OF
TRANSPORTATION FOR
IMPLEMENTATION OF 511 SERVICE
FOR TRAVEL INFORMATION

**PETITION TO INTERVENE
OF VERIZON SOUTH INC.**

1. Verizon is a Virginia corporation that has been certified by the Commission to provide, and is currently providing, local exchange, coin, access and intraLATA toll telecommunications services in South Carolina.

2. For purposes of this proceeding, Verizon's authorized and legal representatives in this matter, to whom all correspondence or communications should be addressed, are:

Steven W. Hamm, Esquire
C. Jo Anne Wessinger Hill, Esquire
RICHARDSON PLOW DEN & ROBINSON, P.A.
1900 Barnwell Street
(P.O. Drawer 7788 (29202))
Columbia, South Carolina 29201
Tel: 803-771-4400
Fax: 803-771-0016

Verizon respectfully requests that the following Verizon representatives be copied on all correspondence or communications:

Stan Bugner, State Director
Verizon South Inc.
1301 Gervais St. — Suite 825
Columbia, S.C. 29201
Tel: 803-254-5736
Fax: 803-254-9626

Dulaney L. O’Roark III
Verizon
5055 North Point Parkway
Alpharetta, GA 30022
Tel.: 678-259-1449
Fax: 678-259-1589

3. By letter dated September 7, 2007, the South Carolina Department of Transportation (“DOT”) petitioned the Commission to designate a 511 abbreviated dialing code for transportation information. The Commission opened this docket to address the DOT’s Petition.

4. Because Verizon is a telecommunications provider in South Carolina, the Commission’s decision in this docket will have a direct impact on Verizon. Verizon has a direct and substantial interest in this docket and respectfully requests permission to intervene in this matter with full rights to participate as a party of record.

5. Verizon seeks to assist the Commission in the development of a full and fair record to address the issues raised and determined in this proceeding.

Verizon's position in this docket will be more fully detailed during the course of this proceeding.

6. Verizon is informed and believes that its request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record to address the concerns and views of Verizon.

Accordingly, Verizon respectfully requests that the Commission (1) find that good cause exists for the filing of this Petition; (2) grant its request and issue an order in this docket permitting Verizon to participate in this proceeding as a party of record; and (3) grant any other and further relief as is just and proper.

Respectfully submitted this ^{16th}~~10~~ day of October 2007.

VERIZON SOUTH INC.

BY. 

Steven W. Hamm, Esquire

email: shamm@richardsonplowden.com

C. Jo Anne Wessinger Hill, Esquire

email: jhill@richardsonplowden.com

RICHARDSON PLOWDEN & ROBINSON, P.A.

1900 Barnwell Street (29201)

P.O. Drawer 7788

Columbia, S.C. 29202

Tel: (803)-771-4400

Fax: (803)-771-0016

COUNSEL FOR VERIZON SOUTH, INC.

OCTOBER 16, 2007

COLUMBIA, SOUTH CAROLINA

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO.: 2007-328-C

IN RE:

PETITION OF THE SOUTH
CAROLINA DEPARTMENT OF
TRANSPORTATION FOR
IMPLEMENTATION OF 511 SERVICE
FOR TRAVEL INFORMATION

CERTIFICATE OF SERVICE

SC PUBLIC SERVICE
COMMISSION

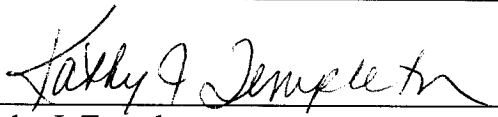
2007 OCT 16 PM 3:00

RECEIVED

This is to certify that I, the undersigned employee of Richardson Plowden & Robinson, P.A., have caused to be served this day, one (1) copy of the Petition to Intervene filed by Verizon South, Inc. ("Verizon") in the above referenced docket by placing a copy of same in the care and custody of the United States Postal Service, first class postage prepaid to the following Parties of Record:

VIA U.S. Mail:

<i>Representing South Carolina Department of Transportation</i> Beacham O. Brooker Jr. South Carolina Department of Transportation Post Office Box 191 Columbia, SC 29202-0191	<i>Representing Office of Regulatory Staff</i> Nanette S. Edwards Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211
<i>Representing BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina</i> Patrick W. Turner BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina d/b/a AT&T Southeast P.O. Box 752 Columbia, SC 29202	<i>Representing South Carolina Telephone Coalition</i> Margaret M. Fox McNair Law Firm, P.A. Post Office Box 11390 Columbia, SC 29211


Kathy J. Templeton

October 16, 2007
Columbia, South Carolina